

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

Civil Action No. 2:23-cv-6

\$10,000.00 IN UNITED STATES
CURRENCY,

Defendant.

VERIFIED COMPLAINT FOR FORFEITURE

AND NOW comes the United States of America, by and through its counsel, Cindy K. Chung, United States Attorney for the Western District of Pennsylvania, and Jill L. Locnikar, Assistant United States Attorney for the Western District, and respectfully represents as follows:

1. This is a civil action *in rem* for forfeiture to the United States of \$10,000.00 in United States currency (the “Defendant Currency”) pursuant to 21 U.S.C. § 881(a)(6).

2. Jurisdiction is predicated upon 28 U.S.C. §§ 1345 and 1355. Venue is proper under 28 U.S.C. §§ 1395 and 1355.

3. On August 15, 2022, U.S. Postal Inspection Service (“USPIS”) in the Western District of Pennsylvania identified a USPS Express Mail parcel, bearing tracking number EI 330 709 998 US (the “Subject Parcel”), as suspicious and interdicted the subject parcel from the USPS Processing and Distribution Center located at 1001 California Ave., Pittsburgh, PA.

4. Upon examination of the Subject Parcel, Inspectors determined that it possessed characteristics consistent with the mailing of illicit narcotics and/or proceeds.

5. The Subject Parcel weighed approximately 1 pound, 12 ounces and bore \$56.00 in U.S. postage and was addressed to “Jamie True” at “13210 Harbor Blvd #376, Garden Grove, CA 92843” from “Ryan Crawford” at “1724 Constitution Blvd., New Kensington, PA 15068.”

6. A handwritten mailing label was affixed to the Subject Parcel. Narcotics traffickers will often hand write the labels attached to the mail piece instead of using a pre-printed label, as is customary with most legitimate businesses utilizing the Express Mail service.

7. The Subject Parcel was to be delivered to a mailbox center in California, a known recipient state for illegal narcotics and/or proceeds being sent from the Western District of Pennsylvania.

8. The Subject Parcel’s mailing zip code (15065) was different from the zip code listed on the return address portion of the express mail label (15068). Also, the “Signature Required” box on the mailing label was not checked, which is a common practice among drug traffickers to thwart identification of the recipient.

9. Investigators researched an electronic database concerning the Subject Parcel’s return address of “1724 Constitution Blvd., New Kensington, PA 15068.” The database did not associate the name of “Ryan Crawford” to the Subject Parcel’s return address, but did associate the names of “Kevin Plummer,” “Kevin S. Plummer,” “Jalise Rutherford,” and “Olushola Onaforokan,” as possible current residents.

10. A search of the USPS database for the return address found one change of address order in the name of “Shalesha Wright” effective January 12, 2021. Investigators also found three current change of address orders associated with the return address: one in the name of “Jalise Rutherford,” one in the name of “Brooke E. Rutherford,” and one in the name of “Charlie O. Barton,” all effective on March 1, 2021.

11. On August 16, 2022, investigators traveled to the address of “1724 Constitution Blvd., New Kensington, PA 15068” to interview Jalise Rutherford (“Rutherford”). Investigators rang the doorbell, and a female who answered the door identified herself as Rutherford.

12. Investigators asked Rutherford for “Ryan Crawford,” and Rutherford stated that no one by that name lived at the address. Investigators showed Ms. Rutherford the Subject Parcel and asked her if she had mailed it; Rutherford replied that she had not.

13. Inspection Service personnel researched a law enforcement database concerning the Subject Parcel’s delivery address of “13210 Harbor Blvd., Garden Grove, CA 92843.” The database did not associate any names with the Subject Parcel’s delivery address. A Google Map search on the delivery address revealed the address to be a business operating under the name of Aim Mail center, which also operates as a Commercial Mail Receiving Agent (CMRA) on behalf of the U.S. Postal Service.

14. On August 18, 2022, investigators obtained a federal search warrant on the Subject Parcel, which was executed the same day. Upon opening the Subject Parcel, investigators found an item in bubble wrap located beneath packing peanuts. The item was unwrapped, and investigators discovered a Lego box. Investigators opened the Lego box and discovered United States currency inside of vacuum sealed bags. Investigators removed the United States currency from the vacuum bags and counted \$10,000.00 in United States currency (the “Defendant Currency”). The Investigators noted that the type of packaging used is consistent with the mailing of proceeds from illicit narcotics trafficking.

15. Individuals who regularly handle controlled substances often leave the scent of controlled substances on the box and other packaging materials they handle. Packaging materials are often stored in close proximity to the controlled substances, transferring the odor to the

packaging materials. Narcotic canines are trained to alert on these substances. On August 15, 2022, Pennsylvania State Police canine, Lesan, alerted to the Subject Parcel.

16. There were no notes, receipts, or instructions in the Subject Parcel. Inspectors know from training and experience that individuals who traffic controlled substances rarely include any type of instruction with proceeds. Legitimate businesses or personal gifts contain notes, letters, receipts, cards, or coupons with the cash or monetary instruments.

17. The Defendant Currency consisted of (100) \$100 dollar bills.

18. On September 8, 2022, investigators contacted the AIM Mail Center in Garden Grove, CA to obtain PS Form 1583 (Application of Delivery of Mail Through Agent) for Box Number 376. The PS Form 1583 identified the name of the current renter of the box as Jamie True ("True") and provided a valid California Driver's license for True as proof of identification. True's address is listed as "10102 Larson Ave., Garden Grove, CA 92843." The PS Form 1583, however, listed True's address as "12172 Marble Cir, Garden Grove, CA 92843." In cases involving the sale of narcotics, Inspectors are witnessing a trend where traffickers use good addresses and/or good names on the address labels. Individuals without criminal histories are often used to receive parcels containing cash or money orders (proceeds of the sale of controlled substances) or contraband for a fee or as a favor on behalf of the actual perpetrator.

19. Based on the above-described investigation, USPIS Inspectors determined that the Defendant Currency was intended to be furnished in exchange for a controlled substance and/or represented proceeds of unlawful drug transactions.

20. The Defendant Currency was therefore seized by USPIS pursuant to 21 U.S.C. § 881(a)(6).

21. Following the seizure, USPIS instituted administrative forfeiture proceedings against the Defendant Currency. Rutherford filed a claim for the Defendant Currency during the administrative forfeiture proceedings. On her claim form, Rutherford specified that she is “unsure what the asset is” and she is not certain where it “is coming from,” but she would like to attempt to claim the asset. As a result, the United States has instituted this civil forfeiture action against the Defendant Currency.

22. Based on the foregoing, the Defendant Currency is forfeitable to the United States pursuant to 21 U.S.C. § 881(a)(6) because it was furnished or intended to be furnished in exchange for a controlled substance and/or constitutes proceeds traceable to an exchange for a controlled substance and/or was intended to be used to facilitate any such violation of the Controlled Substances Act.

WHEREFORE, the United States respectfully requests that process of warrant *in rem* issue for the arrest of the Defendant Currency; that Judgment of Forfeiture be entered in favor of the United States for the Defendant Currency; and that the United States be granted such relief as this Court may deem just and proper, together with the costs and disbursements of this action.

Respectfully submitted,

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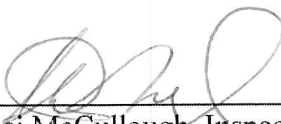
VERIFICATION

I am an Inspector with the United States Postal Inspection Service and the case agent assigned to this case.

I have read the contents of the foregoing complaint for forfeiture, and the statements contained therein are true and correct to the best of my knowledge and belief.

I verify under penalty of perjury that the foregoing is true and correct.

Executed on this 3rd day of January, 2023.



Staci McCullough, Inspector
United States Postal Inspection Service